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Attorney for William Loomis

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
STEPHEN T. PARSHALL,)
ANDREW LYNAM, and)
WILLIAM LOOMIS,)
)
Defendant.)
_____)

Case No. 2:20-CR-00128-KJD-BNW

**STIPULATION TO CONTINUE CALENDAR
CALL AND TRIAL DATE**

(Fourth Request)

IT IS HEREBY STIPULATED AND AGREED by and between, Nicholas A. Trutanich, United States Attorney, District of Nevada, Nicholas D. Dickinson, Assistant United States Attorney, counsel for the United States of America; Richard A. Wright, Esquire and Monti Jordana Levy, Esquire, counsel for Defendant William L. Loomis, Robert M. Draskovich, Esquire, counsel for Defendant Stephan T. Parshall; Thomas F. Pitaro, Esquire, counsel for Defendant Andrew Lynam; that the calendar call scheduled for July 6, 2021, at 9:00 a.m. and the trial scheduled for July 12, 2021, at 9:00 a.m., be vacated for at least 120 days and continued to a date and time convenient to the Court.

IT IS FURTHER STIPULATED AND AGREED, that the parties shall have to and including _____, 2021, to file any pretrial motions and notices of defense.

IT IS FURTHER STIPULATED AND AGREED, that the parties shall have to and including _____, 2021, to file any responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, that the parties shall have to and including _____, 2021, to file any responsive pleadings.

This stipulation is entered into for the following reasons:

1. Parties need additional time to review discovery in preparation for trial and in preparation for the filing of any pretrial motions and notices of defense.

2. Defense counsel require additional time to review the government's evidence with the Defendants to determine whether the case should be resolved outside of trial.

3. Defendants are incarcerated and do not object to the request for a continuance.

4. Accordingly, based on the public health emergency brought about by the COVID-2019 pandemic; the need for additional time to review discovery and prepare the defense; the parties agree to continue the currently scheduled calendar call and trial date.

5. Denial of this request could result in a miscarriage of justice, and the ends of justice served by granting this request outweigh the best interest of the public and the defendant in a speedy trial.

6. The additional time requested by this stipulation is excludable in computing the time within which the trial must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(1)(D) and (H); and (h)(6) and (7)(A), and considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i) and (iv).

7. This is the fourth request for a continuance filed herein.

DATED this 10th day of June, 2021.

WRIGHT MARSH & LEVY

NICHOLAS A. TRUTANICH
United States Attorney

By /s/ Monti Jordana Levy
RICHARD A. WRIGHT, ESQUIRE
MONTI JORDANA LEVY, ESQUIRE
Counsel for Defendant Loomis

By /s/ Nicholas D Dickinson
NICHOLAS D. DICKINSON
Assistant United States Attorney

THE DRASKOVICH LAW GROUP

PITARO & FUMO, CHTD.

By /s/ Robert M. Draskovich
ROBERT M. DRASKOVICH, ESQUIRE
Counsel for Defendant Parshall

By /s/ Thomas F. Pitaro
THOMAS F. PITARO, ESQUIRE
Counsel for Defendant Lynman

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
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 Plaintiff,)
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 vs.)
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 STEPHEN T. PARSHALL,)
 ANDREW LYNAM, and)
 WILLIAM LOOMIS,)
)
 Defendant.)
)

Case No. 2:20-CR-00128-KJD-BNW

FINDINGS AND ORDER ON STIPULATION

Based on the pending Stipulation between the defense counsel and the government, and good cause appearing therefore, the Court hereby finds that:

1. The parties require additional time to review discovery in preparation for trial.
2. Defense counsel require additional time to review the government's evidence with the defendants to determine whether the case should be resolved outside of trial.
3. Defendants are incarcerated and do not object to the request for a continuance.
4. This continuance is not sought for purposes of delay.
5. Denial of this request could result in a miscarriage of justice, and the ends of justice served by granting this request outweigh the best interest of the public and the defendants in a speedy trial.
6. The additional time requested by this stipulation is excludable in computing the time within which the trial must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(1)(D) and (H); and (h)(6) and (7)(A), and considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i) and (iv).
7. This is the fourth request for a continuance filed herein.

ORDER

THEREFORE, it is ORDERED that the parties shall have to and including _____, 2021, to file any pretrial motions and notices of defense.

1 IT IS FURTHER ORDERED, that the parties shall have to and including
2 _____, 2021, to file any responsive pleadings.

3 IT IS FURTHER ORDERED, that the parties shall have to and including
4 _____, 2020, to file any responsive pleadings.

5 IT IS FURTHER ORDERED that the calendar call and trial in the above-captioned matters
6 currently scheduled for July 6, 2021, and July 12, 2021, respectively, respectfully, be vacated and
7 continued to a date and time convenient to this court, that is calendar call
8 _____, _____, at the hour of ____:____ am, and trial
9 _____, _____, at the hour of ____:____ am.

10 DATED this ____ day of _____, 2021.

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13 KENT J. DAWSON
UNITED STATES DISTRICT COURT JUDGE
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